

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE:

MILLARD COURTNEY FARMER, JR.

Debtor.

CHAPTER 13

CASE NO. 18-52363-jwc

**NOTICE OF HEARING ON FIRST INTERIM APPLICATION FOR CHAPTER 13
COMPENSATION OF THE ATTORNEYS-AT-LAW REPRESENTING THE DEBTOR**

PLEASE TAKE NOTICE that a "FIRST INTERIM APPLICATION FOR CHAPTER 13 COMPENSATION OF THE ATTORNEYS-AT-LAW REPRESENTING THE DEBTOR" (the "Application") has been filed in the above case. Pursuant to the Application, the Court is requested to allow and award compensation to Jones & Walden, LLC, as follows:

- (1) \$47,410.00 representing fees; and
- (2) \$1,191.45 representing actual out-of-pocket expenses incurred on behalf of the Debtor.
- (3) That the Debtor be authorized to pay the Law Firm \$33,601.45 which represents the requested award after credit for a pre-petition payment in the amount of \$15,000.00. The Law Firm requests that the Debtor or Debtor's relatives be authorized to pay such amount direct to the Law Firm outside the Plan.

PLEASE TAKE FURTHER NOTICE that the Court shall hold a hearing on the Application on the **4th day of December, 2018, at 10:00 o'clock a.m., in Courtroom 1203, U. S. Courthouse, 75 Ted Turner Drive SW, Atlanta, Georgia 30303.**

Your rights may be affected by the court's ruling on these pleadings. You should read these pleadings carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.) If you do not want the court to grant the relief sought in these pleadings or if you want the court to consider your views, then you and/or your attorney must attend the hearing. You may also file a written response to the pleading with the Clerk at the address stated below, but you are not required to do so. If you file a written response, you must attach a certificate stating when, how and on whom (including addresses) you served the response. Mail or deliver your response so that it is received by the Clerk at least two business days before the hearing. The address of the Clerk's Office is Clerk, U.S. Bankruptcy Court, 75 Ted Turner Drive SW, Atlanta, Georgia 30303. You must also mail a copy of your response to the undersigned at the address stated below.

This 12th day of November, 2018.

JONES & WALDEN, LLC

/s/ Leon S. Jones

By: Leon S. Jones

Georgia Bar No. 003980

Attorneys for Debtor

21 Eighth Street, NE

Atlanta, Georgia 30309

404-564-9300

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE:

MILLARD COURTNEY FARMER, JR.

Debtor.

CHAPTER 13

CASE NO. 18-52363-jwc

**FIRST INTERIM APPLICATION FOR CHAPTER 13 COMPENSATION OF
THE ATTORNEYS-AT-LAW REPRESENTING THE DEBTOR**

TO: THE HONORABLE JEFFERY W. CAVENDER
JUDGE, U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

COMES NOW Jones & Walden, LLC (the "Law Firm"), the attorneys for the Debtor, and files its "FIRST INTERIM APPLICATION FOR CHAPTER 13 COMPENSATION OF THE ATTORNEYS-AT-LAW REPRESENTING THE DEBTOR" (the "Application"), and in support thereof respectfully shows as follows:

1.

The Law Firm shows that it has represented Millard Farmer ("Debtor") since February 2018.

2.

The Law Firm makes its Application for the allowance of compensation for professional services rendered to the Debtor for the period of time from February 1, 2018, through October 31, 2018 ("Application Period"), pursuant to 11 U.S.C. §§ 330 and 331. All services for which compensation is requested were performed on behalf of the Debtor and not on behalf of any other party, creditor, persons or party in interest.

3.

The Law Firm has had numerous conferences with the Debtor, creditors of the Debtor, and with attorneys for various creditors herein with reference to this case, and has filed numerous

pleadings and attended numerous hearings and has performed many other services necessary and proper to the administration of this estate.

4.

The time expended by the Law Firm and the work performed by the Law Firm, for the period for which this Application is made, is duly itemized and set forth in Exhibit "A" which is attached hereto and incorporated herein by this reference.

5.

The out-of-pocket expenses incurred by the Law Firm during the period for which this Application is made are duly itemized and set forth in Exhibit "A" which is attached hereto and incorporated by this reference. The copy costs reflected on Exhibit "A" are charged at the rate of \$0.10 per page. The facsimile costs are charged at the rate of \$1.00 per outgoing page. Out-of-pocket expenses represent the actual cost to the Law Firm.

6.

No agreement or understanding exists between the Law Firm and any other person for the sharing of compensation received or to be received for services rendered in connection with this case.

7.

The agreement for fees between the Law Firm and Debtor provided for fees on an hourly basis.

8.

The Law Firm shows that it has expended a total of 167.70 hours in law firm time for the Application Period, representing hourly fees in the total amount of \$47,410.00. The Law Firm shows that it has incurred a total of \$1,191.45 in out-of-pocket expenses and advances in the course of such representation and has thereby earned a total of \$48,601.45 pursuant to the above-referenced and heretofore disclosed compensation agreement. By this Application, the Law Firm seeks allowance of fees and expenses in the amount of \$48,601.45 and an award of

payment in the amount of \$33,601.45, which represents the requested award after credit for a pre-petition payment in the amount of \$15,000.00.

9.

The Law Firm seeks permission for the Chapter 13 Debtor (or relatives of the Debtor) to pay the amounts requested pursuant to this Application (\$33,601.45) directly to the Law Firm outside the Plan on an interim basis. The Law Firm shows that Debtor's children may participate in payment of any award made pursuant to this Application.

10.

The Law Firm respectfully makes the following representations with regard to the 12-factor Johnson test:

- (a) Time and Labor Required: The Law Firm has expended a total of 167.70 law firm hours through October 31, 2018, at the following rates:

<u>Attorney(s)</u>	<u>Hourly Rate</u>
Leon S. Jones	\$350.00
Cameron McCord	\$325.00
Leslie Pineyro	\$325.00
Matthew Tokajer	\$250.00
J. Kelley Killorin	\$225.00
Lauren Brown (Paralegal)	\$100.00
Ellen Wooden (Paralegal)	\$100.00

- (b) Novelty and Difficulty of Questions Presented: The Chapter 13 reorganization case involves the effort to reorganize a business debtor. The Law Firm shows that the novelty and difficulty of questions presented are greater than those normally associated with a Chapter 13 bankruptcy case.
- (c) Skill Requisite to Perform Legal Services Properly: The Law Firm respectfully represents that it has the skill requisite to perform legal services heretofore rendered in a proper fashion.
- (d) The Preclusion of Other Employment Due to Acceptance of the Case: The Law Firm respectfully requests that the time expended by the Law Firm in connection

with this case could have been devoted to matters being handled for other clients, but for the time demands placed upon the Law Firm by the Law Firm's involvement in this case.

- (e) Customary Fee for the Type of Services Rendered: The Law Firm shows that all fees requested by the Law Firm were generated by applying the Law Firm's normal hourly billing rate to the number of hours actually expended. Such itemization is detailed on Exhibit "A". The Law Firm respectfully represents that the customary compensation for the attorney services in connection with a bankruptcy case is upon an hourly billing basis.
- (f) Whether Fee is Fixed or Contingent: The Law Firm's charges are subject to being awarded by this Court under 11 U.S.C. § 330. The Fee is thus not truly fixed or contingent but has some characteristics of both.
- (g) Time Limitations Imposed by Client or Other Circumstances: The Law Firm shows that many of the services rendered have been performed under exacting time limitations imposed by the nature of the case.
- (h) Amount Involved and Results Obtained: The Law Firm has handled a large number of routine and complex Chapter 13 issues on behalf of the Debtor. The Law Firm has handled matters regarding the Debtor's unsecured and secured creditors. The Law Firm has represented the Debtor throughout this bankruptcy case.
- (i) Experience, Reputation, and Ability of Attorneys: The Law Firm respectfully represents that it has had a significant amount of experience within the areas involved in this representation.
- (j) Undesirability of the Case: The Law Firm respectfully represents that this factor is not normally applicable to a Chapter 13 case.

- (k) Nature and Length of Professional Relationship with the Client: The Law Firm shows that it has represented the Debtor since February 2018.
- (l) Awards in Similar Cases: The Law Firm respectfully represents that its Application is in keeping with similar applications for Chapter 13 compensation filed by attorneys representing business debtors in bankruptcy cases within this district, but that this is a particularly difficult case.

WHEREFORE, the Law Firm prays that it be allowed Chapter 13 compensation as follows:

- (1) \$47,410.00 representing fees; and
- (2) \$1,191.45 representing actual out-of-pocket expenses incurred on behalf of the Debtor.
- (3) That the Debtor be authorized to pay the Law Firm \$33,601.45 which represents the requested award after credit for a pre-petition payment in the amount of \$15,000.00. The Law Firm requests that the Debtor (or relatives of Debtor) be authorized to pay such amount direct to the Law Firm outside the Plan on an interim basis.

RESPECTFULLY SUBMITTED this 12th day of November, 2018.

JONES & WALDEN, LLC

/s/ Leon S. Jones

By: Leon S. Jones

Georgia Bar No. 003980

Attorney for Debtor

21 Eighth Street, NE

Atlanta, Georgia 30309

(404) 564-9300

EXHIBIT "A" FOLLOWS

Millard Farmer
1196 DeKalb Avenue
Atlanta GA 30307

Page: 1
November 12, 2018
Account No: 2493-00M
Statement No: 51010

Re: Chapter 13 (CM)

Fees

			Rate	Hours	
02/01/2018					
	CMM	Conf with client re RICO	325.00	1.00	325.00
02/06/2018					
	CMM	Prepare for and attend conference with Millard Farmer; conf with LSJ and LP (.6)	325.00	4.10	1,332.50
	LMP	Conference with M Farmer (re chapter 13 with RICO judgment) (1.4)	325.00	1.40	455.00
	LSJ	Conference with CM re strategy (.1); conf with CM (.1); conf with CM re 13 plan (.5)	350.00	0.70	245.00
02/07/2018					
	CMM	Telephone Conference with client (.3) t/c client re strategy (.2)	325.00	0.50	162.50
02/08/2018					
	EW	Revise Funding Commitment and Engagement Letter; multiple revisions to same	100.00	0.50	50.00
	CMM	Conference with client re status of litigation; mult conf with client	325.00	2.80	910.00
	LSJ	Prepare engagement; prepare plan and disclosure (.8); review DC litigation (.2)	350.00	1.00	350.00
02/09/2018					
	LMP	Review federal rules and conf re options (.2) review options (.1) Prepare filing analysis (.1)	325.00	0.40	130.00
	LB	Set up client for credit counseling ; prepare POS in district court action	100.00	0.60	60.00
	CMM	Multiple telephone conferences with client and Buddy Parker re settlement and bankruptcy; conf LSJ re same	325.00	1.00	325.00
	LSJ	Conference with CM re 13 strategy and plan (.4); prepare schedules (.1); conf with client re strategy (.1)	350.00	0.60	210.00
02/12/2018					
	CMM	Email exchange with Buddy Parker (.1) corr to client re schedules (.2)	325.00	0.30	97.50
	MJT	Review documents needed to file remaning schedules.	250.00	0.60	150.00

Re: Chapter 13 (CM)

		Rate	Hours	
02/13/2018				
LB	Prepare COA for Maloy Jenkins Parker & debtor; file same	100.00	0.40	40.00
CMM	Telephone Conference with client; email to client re 341 (.2)			
	prepare attorney disclosure statement (.2)	325.00	0.40	130.00
LSJ	Review first day filings and commencement notice; calendar deadlines	350.00	0.20	70.00
02/14/2018				
LB	Finalize App to employ special counsel; file & serve same; upload order	100.00	0.40	40.00
CMM	Edit app to employ; conf LSJ re same (.6) t/c Ralph Goldberg (.1)	325.00	0.70	227.50
LSJ	Review and revise application, declaration and order for employment prepared by proposed special counsel (.6); conf with CM re same; review for filing (.2)	350.00	0.80	280.00
02/15/2018				
LB	Revise Order on App to Employ Special Counsel; email to CMM re: same	100.00	0.50	50.00
EW	Finalize, file, and serve Notice of Filing re App to Employ Special Counsel	100.00	0.20	20.00
MJT	Revise special counsel order and send to TT for consent (0.4), draft and file notice of filing of executed fee contract (0.4), contact special counsel regarding notice of filing of executed fee contract (0.2)	250.00	1.00	250.00
02/16/2018				
LSJ	Review employment app re special counsel; review commencement notice; calendar deadlines and events; review special counsel employment agreement	350.00	0.10	35.00
02/18/2018				
LSJ	Review docket and status of submission and order on special counsel application for employment	350.00	0.10	35.00
02/20/2018				
CMM	Telephone Conference with client re schedules	325.00	0.20	65.00
02/22/2018				
CMM	Telephone Conference with client re status of schedule information	325.00	0.70	227.50
MJT	Review general order regarding attorney fee disclosure (0.2), draft application to extend time to file schedules (.6)	250.00	0.80	200.00
LSJ	Prepare schedules and disclosure	350.00	0.20	70.00
02/23/2018				
LB	Review Troup Co. court records; conf. with CMM re: same; revise Attny Disclosure Statement; file same	100.00	0.60	60.00
MJT	Email trustee to get permission to sign order on application to employ special counsel (0.1), draft order to extend time to file schedules (0.2).	250.00	0.30	75.00
LSJ	Prepare attorney disclosure statement and schedules	350.00	0.40	140.00
02/24/2018				
LSJ	Review extension motion and filed atty disclosure; calendar			

Re: Chapter 13 (CM)

			Rate	Hours	
	deadlines		350.00	0.10	35.00
02/28/2018					
CMM	Telephone Conference with client; review motion for new trial; t/c MT re status (1) t/c Ralph Goldberg re litigation strategy (.2)	325.00	1.20	390.00	
MJT	Telephone Conference with trustee to discuss consent order for application to employ special counsel.	250.00	0.40	100.00	
03/01/2018					
CMM	Review district court pleadings (.5); t/c client re schedules; email to client re schedules; (.3) conf MT re Chp 13 plan terms (.2)	325.00	1.00	325.00	
MJT	Legal research on treatment of disputed unliquidated debts and confirmation requirements.	250.00	2.70	675.00	
03/03/2018					
CMM	Telephone Conference with client	325.00	0.30	97.50	
LSJ	Review docket and entered extension order; prepare plan	350.00	0.10	35.00	
03/05/2018					
CMM	Receipt and review of documents (.4) conf with client (3.0)	325.00	3.40	1,105.00	
MJT	Prepare plan.	250.00	0.60	150.00	
LSJ	Prepare schedules (.1); prepare plan (.1)	350.00	0.20	70.00	
03/06/2018					
CMM	Review plan (.3)	325.00	0.30	97.50	
MJT	Prepare plan and means test (0.9), discuss plan with CMM (0.2), edit plan (0.4), meeting with CMM and Millard (1.0)	250.00	2.50	625.00	
LSJ	Prepare plan	350.00	0.20	70.00	
03/07/2018					
CMM	Telephone Conference with Farmer (.3) conf MT re amendment (.1) revise plan (.2) revise schedules (.1) conf with client (2.4)	325.00	3.10	1,007.50	
MJT	Legal research on standard on Rico claims (1.3), edit schedules (0.3), meet with CMM and client (1.2), read settlement agreement for details on indemnification (0.4).	250.00	3.20	800.00	
LSJ	Prepare plan	350.00	0.10	35.00	
03/08/2018					
EW	Finalize, file and serve Chapter 13 Plan (0.4); finalize schedule completion and file (0.5)	100.00	0.90	90.00	
MJT	Review schedules and plan (0.3), file schedules and plan (0.3)	250.00	0.60	150.00	
03/09/2018					
LB	Prepare schedules	100.00	0.20	20.00	
MJT	Review order staying rico case.	250.00	0.10	25.00	
03/12/2018					
LSJ	Review plan and schedules	350.00	0.10	35.00	
03/19/2018					
CMM	Review filed pleadings (.1) r/r order staying district court				

Re: Chapter 13 (CM)

			Rate	Hours	
	case (.1)		325.00	0.20	65.00
03/20/2018	MJT	Telephone Conference with client regarding plan	250.00	0.30	75.00
03/22/2018	CMM	Review client research on Rico case	325.00	0.20	65.00
03/23/2018	LSJ	Review trustee notice re-setting 341 and confirmation hearing and requiring business forms; calendar events	350.00	0.10	35.00
03/26/2018	CMM	Email exchange re creditor meeting (.1) t/c Ralph Goldberg (.1) t/c trustee (.2) prepare order (.1) t/c client (.2)	325.00	0.70	227.50
03/29/2018	CMM	Review order (.1) t/c client (.3) review transcript (.3)	325.00	0.70	227.50
03/30/2018	LB	Finalize & upload order granting Goldberg employment	100.00	0.20	20.00
04/02/2018	CMM	Telephone Conference with client re trial transcript	325.00	0.30	97.50
04/04/2018	LSJ	Review entered order for employment of special counsel	350.00	0.10	35.00
04/06/2018	MJT	Prepare 341 business packet.	250.00	2.70	675.00
04/10/2018	MJT	Prepare and edit 341 business packet.	250.00	1.30	325.00
04/11/2018	MJT	Finalize business 341 packet (0.4), send packet to TT (0.3)	250.00	0.70	175.00
04/12/2018	CMM	Telephone Conference with Farmer	325.00	0.30	97.50
04/17/2018	CMM	Attend meeting with Ralph Goldberg	325.00	2.40	780.00
	MJT	Attend meeting at Ralph Goldbergs office (1.3), travel to and from meeting (1.1)	250.00	2.40	600.00
04/18/2018	CMM	Receipt and review of notice of appearance	325.00	0.10	32.50
04/20/2018	CMM	Receipt and review of POC; corr to client re same	325.00	0.20	65.00
04/23/2018	LSJ	Review Murphy POC	350.00	0.10	35.00
	CMM	Telephone Conference with Mitt re claims	325.00	0.10	32.50

Re: Chapter 13 (CM)

			Rate	Hours	
05/07/2018					
	CMM	t/c Colin Bernadino	325.00	0.20	65.00
05/08/2018					
	CMM	Telephone Conference with client	325.00	0.80	260.00
05/10/2018					
	CMM	Telephone Conference with client (.2) review client docs (.4)	325.00	0.80	260.00
	LSJ	t/c Jo Farmer (.2)	350.00	0.20	70.00
		Prepare fee app/notice			
05/11/2018					
	CMM	Attend 341	325.00	2.90	942.50
05/14/2018					
	LSJ	Conference with CM re strategy	350.00	0.20	70.00
	LMP	Review case options (.1)	325.00	0.10	32.50
	CMM	Conference with LP re conversion (.2) r/r MRAS; corr to client re same (.3)	325.00	0.50	162.50
05/15/2018					
	LSJ	Conference with CM re strategy	350.00	0.10	35.00
	CMM	Telephone Conference with Millard; t/c with Ralph	325.00	0.50	162.50
05/16/2018					
	LSJ	Review Murphy's MRAS	350.00	0.10	35.00
	CMM	Conference with client (1.6)	325.00	1.60	520.00
05/17/2018					
	MJT	Prepare objection to proof of claim (1.0), call with Jo Farmer regarding payment method (0.1), discuss 341 objections with CMM (0.1)	250.00	1.20	300.00
05/21/2018					
	LSJ	Conference with CM and prep order on stay relief and confirmation	350.00	0.40	140.00
	CMM	Receipt and review of objection to Chapter 13 plan (.3) prepare order on MRAS; conf LSJ re same (1) t/c client re order (.2)	325.00	1.50	487.50
	MJT	Update schedules based on trustee's objections (0.7), call with Jo Farmer (0.1), call with Millard Farmer (0.2).	250.00	1.00	250.00
05/25/2018					
	LSJ	Conference with CM re trustee change of position on holding confirmation in abeyance and strategy on amending plan	350.00	0.20	70.00
05/29/2018					
	CMM	Conf MT re objections	325.00	0.30	97.50
	LMP	Prepare objection response and strategy (.3)	325.00	0.30	97.50
	MJT	Conference with LP and CMM to discuss case (0.2), review objections to confirmation and draft amendments (1.1), legal research on good faith factors (0.3), review general orders regarding chapter 13 plan (0.2), call with client (1.6),	250.00	3.30	825.00

Re: Chapter 13 (CM)

			Rate	Hours	
05/30/2018					
	CMM	Review response to trustee objection	325.00	0.50	162.50
	MJT	Review Murphy's objection to confirmation (0.5), legal research to respond to Murphy's objection (1.3), draft response to Murphy's objection (1.9), edit response (0.3), discuss amendments with CMM (0.1), draft amended chapter 13 plan (1.0), amend schedule C (0.4), draft credit card affidavit (0.1), draft objection to Murphys proof of claim (0.5).	250.00	6.10	1,525.00
05/31/2018					
	CMM	Telephone Conference with client; review and revise responses to objections and objection to proof of claim	325.00	1.20	390.00
	MJT	Revise amended schedules, plan and responses (1.1), email proposed changes to client (0.2).	250.00	1.30	325.00
06/01/2018					
	CMM	Conference with client re Chp 13	325.00	1.20	390.00
	MJT	Prepare for meeting with client (0.5), meeting with client (1.9), file amendments (1.0).	250.00	3.40	850.00
06/04/2018					
	LB	Finalize amendment to schedules; responses to objections to confirmation (Ch. 13 Trustee & Murphy); obj. to Murphy POC (.9); prepare cert. of service of amended plan (.5); file & serve all (.3)	100.00	1.70	170.00
	CMM	Prepare for hearing	325.00	0.60	195.00
	MJT	Telephone Conference with trustee to discuss confirmation hearing (0.1)	250.00	0.10	25.00
	MJT	Prepare for hearing (0.1), research on good faith in regards to chapter 13 liquidation plans (1.1).	250.00	1.20	300.00
06/05/2018					
	CMM	Prepare for and attend confirmation hearing	325.00	8.70	2,827.50
	LMP	Prepare for conf hearing (.4)	325.00	0.40	130.00
	MJT	Prepare for confirmation hearing. Attend confirmation hearing.	250.00	4.50	1,125.00
06/07/2018					
	LMP	Prepare case strategy (.1)	325.00	0.10	32.50
06/08/2018					
	CMM	Email exchange re order and objection to claim (.2) t/c CB (.1)	325.00	0.30	97.50
06/10/2018					
	LSJ	Review claim objection; calendar hearing; review response brief re plan objection	350.00	0.10	35.00
06/11/2018					
	CMM	Telephone Conference with Collin Bernadino re settlement	325.00	0.40	130.00
06/13/2018					
	CMM	Email exchange re MRAS (.1) t/c Ralph Goldberg (.2)	325.00	0.30	97.50
	MJT	Attend SEC Townhall meeting with Millard Farmer.	250.00	3.50	875.00

Re: Chapter 13 (CM)

			Rate	Hours	
06/14/2018	LSJ	Receipt and review of notice of evidentiary hearing; calendar same; conf with CM re same	350.00	0.20	70.00
06/15/2018	CMM	Mult t/c with client and Colin Bernadino re status; review order (1.1)	325.00	1.10	357.50
06/18/2018	LSJ	Email and conference with CM re mediation and strategy; review docket	350.00	0.20	70.00
	CMM	Prepare motion for mediation (.8)	325.00	0.80	260.00
06/19/2018	LSJ	Prepare motion and order for mediation; conference with CM re same	350.00	0.30	105.00
	MJT	Telephone Conference with Millard Farmer re status and strategy	250.00	1.40	350.00
06/20/2018	LSJ	Prepare and file mediation motion; telephone call to chambers re appointment of mediator	350.00	0.20	70.00
	EW	Revise Joint Motion Requesting Mediation (0.2); finalize, file and serve same (0.3)	100.00	0.50	50.00
06/22/2018	LSJ	Telephone conference with client re status and strategy	350.00	0.70	245.00
06/27/2018	MJT	Telephone Conference with court regarding availability for mediation.	250.00	0.10	25.00
07/02/2018	MJT	Telephone Conference with client to discuss upcoming hearing and GSU Investor advocay hearing.	250.00	1.20	300.00
07/05/2018	CMM	Email exchange re consent order on MRAS	325.00	0.20	65.00
	LSJ	Conference with CM re status and strategy	350.00	0.30	105.00
07/06/2018	CMM	Mult Telephone Conference with client (1)	325.00	1.00	325.00
07/09/2018	CMM	Email exchange re status	325.00	0.20	65.00
07/10/2018	CMM	Receipt and review of objection to claim (.2) email exchange re hearing and mediation (.2)	325.00	0.40	130.00
	LSJ	Review Murphy response to POC objection	350.00	0.10	35.00
07/12/2018	CMM	Telephone Conference with client re status	325.00	0.40	130.00
	MJT	Telephone Conference with Millard discussing contacting			

Re: Chapter 13 (CM)

			Rate	Hours	
		Jaren Doss (works with GSU Investor advocacy group) about possible SEC investigation.	250.00	0.20	50.00
07/13/2018	LSJ	Review entered mediation order; conf with CM re same	350.00	0.10	35.00
07/16/2018	CMM	Telephone Conference with client re status	325.00	0.60	195.00
07/18/2018	CMM	r/r of mediation order; t/c client re same	325.00	0.30	97.50
07/19/2018	CMM	Telephone Conference with client; t/c with Jason Doss; email exchange re mediation	325.00	1.30	422.50
07/24/2018	CMM	Email exchange re mediation	325.00	0.20	65.00
07/30/2018	CMM	Email exchange re mediation	325.00	0.10	32.50
	LSJ	Prepare fee application	350.00	0.20	70.00
08/06/2018	MJT	Prepare mediation statement.	250.00	3.20	800.00
08/07/2018	MJT	Telephone Conference with client.	250.00	0.30	75.00
08/21/2018	CMM	Prepare mediation statement (.2)	325.00	0.20	65.00
08/23/2018	CMM	Telephone Conference with client re mediation (.6) review transcript (1.8)	325.00	2.40	780.00
08/28/2018	CMM	Telephone Conference with client	325.00	0.10	32.50
	MJT	Review brief for new trial in order to supplement mediation statement (1.2), edit mediation statement (0.7)	250.00	1.90	475.00
08/29/2018	MJT	edit mediation statement.	250.00	1.10	275.00
08/30/2018	CMM	Finalize mediation statement	325.00	0.50	162.50
08/31/2018	CMM	Telephone Conference with client	325.00	1.30	422.50
09/04/2018	CMM	Review mediation statement	325.00	0.40	130.00
09/05/2018	CMM	Prepare mediation statement; corr to client re same; t/c Jo re			

Re: Chapter 13 (CM)

	same	Rate 325.00	Hours 2.30	747.50
09/07/2018				
CMM	Telephone Conference with client	325.00	0.20	65.00
JKK	Review judgment documents (.4); Legal research regarding attorneys fees (4.7)	225.00	5.10	1,147.50
09/10/2018				
JKK	Legal research regarding attorneys fees and RICO	225.00	1.40	315.00
09/11/2018				
CMM	Correspondence to Colin Bernardino (.1)	325.00	0.10	32.50
CMM	Conference with Judge Bonapfel (2.2)	325.00	2.20	715.00
JKK	Prepare memo discussing legal research regarding attorneys fees (.4) Legal research regarding attorneys fees (4.3)	225.00	4.70	1,057.50
MJT	Attend Mediation session with Millard, Cameron and J. Bonapfel.	250.00	2.00	500.00
09/12/2018				
CMM	Telephone Conference with client re BPO	325.00	0.20	65.00
09/14/2018				
CMM	Telephone Conference with Ralph Goldberg (.1) email to CB (.1)	325.00	0.20	65.00
09/17/2018				
CMM	Receipt and review of BPO (.2) t/c client (.5)	325.00	0.70	227.50
09/18/2018				
CMM	Attend mediation	325.00	8.50	2,762.50
MJT	Prepare liquidation analysis including BPO for real estate.	250.00	0.70	175.00
09/19/2018				
LSJ	Review settlement terms; conf with CM; prepare settlement agreement	350.00	0.40	140.00
CMM	Conf with MT re settlement	325.00	0.30	97.50
MJT	Conference with Cameron to discuss settlement.	250.00	0.20	50.00
09/21/2018				
CMM	Telephone Conference with Julie Aninia	325.00	0.20	65.00
09/25/2018				
MJT	Prepare motion to approve compromise (1.3), draft amended plan (1.2)	250.00	2.50	625.00
09/28/2018				
MJT	Review and edit chapter 13 plan (0.5), review and edit settlement motion (0.5)	250.00	1.00	250.00
10/01/2018				
MJT	Review and edit chapter 13 plan (0.5), review and edit motion approving settlement (0.5)	250.00	1.00	250.00

Re: Chapter 13 (CM)

		Rate	Hours	
10/04/2018				
CMM	Review plan and 9019 motion; email to Colin Bernadino re same	325.00	0.40	130.00
	For Current Services Rendered		167.70	47,410.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Leon S. Jones	9.20	\$350.00	\$3,220.00
Cameron Martin McCord	75.30	325.00	24,472.50
Leslie Pineyro	2.70	325.00	877.50
Ellen Wooden	2.10	100.00	210.00
Lauren Brown	4.60	100.00	460.00
J. Kelley Killorin	11.20	225.00	2,520.00
Matthew J. Tokajer	62.60	250.00	15,650.00

Expenses

02/09/2018	Filing fee - Chapter 13 Bankruptcy	310.00
02/14/2018	Postage (5 @ .68)	3.40
02/15/2018	Postage	0.47
02/23/2018	Postage (2 @ .47)	0.94
03/01/2018	Online legal research	6.00
03/01/2018	Fee for Online Court Documents (PACER)	8.40
03/08/2018	Filing fee - Schedules and amended creditor matrix	31.00
03/08/2018	Postage (4 @ .47)	1.88
04/01/2018	Online legal research	381.00
05/01/2018	Fee for Online Court Documents (PACER)	1.30
05/09/2018	Postage (2 @ .47)	0.94
05/11/2018	Parking	14.00
06/01/2018	Online legal research	183.38
06/04/2018	Filing fee - Amended Schedules E/F, G	31.00
06/04/2018	Postage (4 @ .47) (4 @ .68) (4 @ 1.63)	11.12
06/05/2018	Postage (4 @ .47)	1.88
06/20/2018	Postage (4 @ .47)	1.88
07/01/2018	Online legal research	76.88
07/01/2018	Fee for Online Court Documents (PACER)	1.10
09/01/2018	Online legal research	36.00
10/01/2018	Online legal research	88.88
	Total Expenses	1,191.45
	Total Current Work	48,601.45

Payments

02/08/2018	Payment (Millard C. Farmer)	-4,000.00
02/08/2018	Payment (Eleanor Farmer Meeker)	-4,000.00
02/12/2018	Cash Payment	-7,000.00
	Total Payments	-15,000.00
	Balance Due	<u>\$33,601.45</u>

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:

MILLARD COURTNEY FARMER, JR.

Debtor.

CHAPTER 13

CASE NO. 18-52363-jwc

CERTIFICATE OF SERVICE

I hereby certify that I have caused to be served a copy of the foregoing Notice of Hearing and the foregoing Application on the parties reflected below. I further certify that I have caused to be served a copy of the foregoing Notice of Hearing *only* on all parties referenced on the attached mailing matrix by depositing a copy of same in the United States Mail, postage prepaid.

Office of the United States Trustee
362 Richard B. Russell Federal Building
75 Ted Turner Drive S.W.
Atlanta, Georgia 30303

Millard Courtney Farmer, Jr.
1196 Dekalb Ave
Atlanta, GA 30307

Nancy J. Whaley, Standing Ch. 13 Trustee
303 Peachtree Center Avenue
Suite 120, SunTrust Garden Plaza
Atlanta, GA 30303

This 12th day of November, 2018.

JONES & WALDEN, LLC

/s/ Leon S. Jones

By: Leon S. Jones
Georgia Bar No. 003980
Attorneys for Debtor
21 Eighth Street, NE
Atlanta, Georgia 30309
(404) 564-9300

Label Matrix for local noticing
113E-1
Case 18-52363-jwc
Northern District of Georgia
Atlanta
Mon Nov 12 16:01:24 EST 2018

City of Atlanta
Office of Revenue
55 Trinity Ave, Suite 1350
Atlanta, GA 30303-3534

Julie M. Anania
Nancy J. Whaley
Standing Chapter 13 Trustee
Suite 120
303 Peachtree Center Avenue
Atlanta, GA 30303-1286

DeKalb County Tax Commissioner
4380 Memorial Drive, Suite 100
Decatur, GA 30032-1239

Colin Michael Bernardino
Kilpatrick Townsend & Stockton LLP
1100 Peachtree Street, NE
Suite 2800
Atlanta, GA 30309-4530

Ralph Goldberg
1400 Montreal Road
Suite 100
Tucker, GA 30084-6919

John H. Murphy
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1360 Peachtree Street NE
Suite 910
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Nan Freeman
c/o Ken Gordon
PO Box 1088
Lagrange, GA 30241-0020

Wilmer Parker
Suite 910
1360 Peachtree Street
Atlanta, GA 30309-3287

Resurgent Capital Services
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